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4 Attorney for Defendant,
 5 BELL TRANS

7 U.S. DISTRICT COURT
 8 DISTRICT OF NEVADA

9 THEODORE TRAPP, on his own behalf and on
 10 behalf of all others similarly situated.

11 Plaintiff,

12 vs.

13 BIG POPPA'S, LLC, a Nevada limited liability
 company d/b/a BADDA BING MEN'S CLUB;
 14 SKY TOP VENDING, INC., a Nevada corporation
 d/b/a CAN CAN ROOM; LA FUENTE, INC., a
 15 Nevada corporation d/b/a CHEETAH'S; C.P.
 FOOD AND BEVERAGE, INC., a Nevada
 16 corporation d/b/a CLUB PARADISE; DÉJÀ VU
 SHOWGIRLS; PALOMINO CLUB, INC., a
 17 Nevada corporation d/b/a PALOMINO CLUB;
 SHAC, LLC, a Nevada corporation d/b/a
 18 SAPPHIRE; K-KEL, INC., a Nevada corporation
 d/b/a SPEARMINT RHINO; D.2801 WESTWOOD
 19 INC., a Nevada corporation d/b/a TREASURES;
 LITTLE DARLINGS OF LAS VEGAS, LLC, a
 20 Nevada limited liability company d/b/a LITTLE
 DARLINGS; O.G. ELIADES, A.D., LLC, a
 21 Nevada limited liability company d/b/a OLYMPIC
 GARDENS; LAS VEGAS ENTERTAINMENT,
 22 LLC, a Nevada limited liability company d/b/a
 LARRY FLYNT'S HUSTLER CLUB; MICHAEL
 23 A. SALTMAN d/b/a MINXX; RICK'S LAS
 VEGAS; FRIAS MANAGEMENT, LLC, a
 24 Nevada limited liability company d/b/a ACE CAB
 COMPANY and A-NORTH LAS VEGAS
 25 CAB; WESTERN CAB COMPANY, a Nevada
 corporation d/b/a WESTERN CAB COMPANY
 26 and WESTERN LIMOUSINE; NEVADA
 CHECKER CAB CORPORATION, a Nevada
 27 corporation d/b/a NEVADA CHECKER CAB
 COMPANY; NEVADA STAR CAB
 28 CORPORATION, a Nevada corporation d/b/a
 STAR CAB COMPANY; NEVADA YELLOW
 CAB CORPORATION, a Nevada corporation

CASE NO. 2:09-CV-00995-KJD-GWF

STIPULATION AND ORDER
 TO EXTEND DATE FOR
 DEFENDANT BELL TRANS
 TO RESPOND TO PLAINTIFF'S
 CLASS ACTION COMPLAINT

(SECOND REQUEST)

1 d/b/a YELLOW CAB COMPANY; LUCKY CAB)
COMPANY OF NEVADA, a Nevada corporation)
2 d/b/a LUCKY TRANS; SUN CAB, INC., a Nevada)
corporation d/b/a NELLIS CAB COMPANY; CLS)
3 NEVADA, LLC, a Nevada limited liability)
company d/b/a CLS TRANSPORTATION)
4 LAS VEGAS; ON DEMAND SEDAN)
SERVICES, LLC, a Nevada limited liability)
5 company d/b/a ODS LIMOUSINES and ODS)
CHAUFFEURED TRANSPORTATION; BLS)
6 LIMOUSINE SERVICE OF LAS VEGAS, INC.;)
DESERT CAB, INC., a Nevada corporation d/b/a)
7 DESERT CAB COMPANY and ODYSSEY)
LIMOUSINE; BELL TRANS A NEVADA)
8 CORPORATION, a Nevada corporation d/b/a)
BELL TRANS; TONY CHONG, an individual;)
9 and DOE EMPLOYEES 1-1000;)

10 Defendants.)
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12 Plaintiff Theodore Trapp ("Plaintiff" or "Trapp") and Defendant Bell Trans, a Nevada
13 Corporation propose the following Stipulation and Proposed Order enlarging the time for Defendant
14 to answer or otherwise respond to Plaintiff's Complaint. In support, the Parties state as follows:

15 **WHEREAS**, on June 2, 2009, Plaintiff filed a four-count putative class action Complaint
16 ("Complaint") against Bell Trans alleging violations of Nevada's Racketeering Statute and
17 Consumer Fraud Statute;

18 **WHEREAS**, by Stipulation dated July 16, 2009, Plaintiff and Bell Trans stipulated to extend
19 the time for Bell Trans to respond to Plaintiff's Complaint until August 3, 2009 (order signed on July
20 22, 2009);

21 **WHEREAS**, Defendant has now concluded that there are legal issues it believes would be
22 best addressed by a motion under Rule 12(b)(6) and it requires additional time in order to prepare
23 such motion, such that Defendant seeks an additional three-week extension of time to respond to
24 Plaintiff's Complaint up to and including August 24, 2009;

25 **WHEREAS**, defense counsel has conferred with Plaintiff's counsel and is authorized to state
26 that Plaintiff has no objection to the extension of time requested herein.

27 **NOW, THEREFORE**, the parties hereby **STIPULATE and AGREE** as follows:
28

1 Defendant's last day to answer or otherwise plead to Plaintiff's Complaint shall be August
2 24, 2009.

3 Dated this 3 day of August, 2009.

4 KUMMER KAEMPFER BONNER RENSHAW
5 & FERRARIO

6 //s//
7 James E. Smyth, II, Esq.
8 3800 Howard Hughes Parkway, Seven Floor
9 Las Vegas, Nevada 89169

10 Jay Edelson, Esq.
11 Kamber Edelson, LLC
12 350 North LaSalle Street, Suite 1300
13 Chicago, IL 60654
14 Attorneys for Plaintiffs

//s//
Mark E. Trafton, Esq.
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Las Vegas, Nevada 89102

Attorney for Defendant,
BELL TRANS

11 IT IS SO ORDERED:

12
13 DATED: August 4, 2009

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15 PEGGY A. LEEN
16 UNITED STATES MAGISTRATE JUDGE
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